

May 8th 2017

ARCTEK Satellite Productions
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Good Morning, Clay.

I'm Brian Stanley, owner of ARCTEK Satellite Productions. I am writing you in regards to the DVB-CID that has been discussed over the last few years and is to be implemented September 2017. This is a topic I have been watching and observing since 2015 and would like to express my concerns about the added ID.

NIT-CID is currently an active service on current encoders:

I am not sure if you are aware that our current encoders have the NIT-CID already in them and is already active.

NIT-CID is an active service in all my Adtec EN81s encoders which were purchased less than 5 years ago. The NIT-CID is in the ASI stream and can be received and decoded now. By using the NIT-CID already in the encoders, the uplink company and the satellite space providers don't have to spend additional funds on new modulators and receivers.

DVB-CID implication on uplink companies:

In order to be FCC compliant I will need to purchase new modulators rendering my current modulators useless. My current modulators are less than 5 years old and I am still paying off the original purchase. They should have a use life of 10+ years. My company is a small business. I have 5 trucks. In order to satisfy the DVB-CID mandate I will need to spend upwards of \$60,000 for modulators with DVB-CID capabilities. This additional expense is a true hardship on my company as well as others in the industry especially when NIT-CID is already in the ASI stream and can be decoded now. This additional expense is not something we cannot recoup and has a real possibility of putting some small uplink providers out of business.

Need for government subsidies:

If the FCC could help off set the cost of the equipment cost it would help me and others like me to implement your mandate in a partnership with the FCC instead of an adversarial compliance. Again especially because we have NIT-CID already in our trucks and available now.

Satellite industry is dying:

With the ever expanding bandwidth available to networks and corporations via public internet and bonded cellular, the need for satellite bandwidth is diminishing. We are already seeing market segments like New's Live Shots and Corporate events going to bonded cellular and Video over IP. We need the FCC to help us keep our market share and show the industry how important satellite communication is to the world, not implement more restriction and investment to an already shrinking industry.

Delay the implementation further:

Finally is it possible to delay the implementation further allowing more research and discussion on how to best accomplish this for all involved? Rogue carriers happen, however they are not frequent enough to warrant such an extreme measure for rule following companies in the satellite uplink industry. You know our accessing procedures are extensive and very well orchestrated with communication and phone numbers exchanged each and every time. The number of times the DVB-CID will be used will be less than 1% in IDing a carrier from an uplink truck. Even then the space provider will use cell numbers, booking data and NIT-CID or our ID in the metadata before tuning in the DVB-CID.

In conclusion, I have worked in the satellite industry for 25 years from analog ADAS sub carriers to digital HD metadata. The metadata in our current ASI stream is a far better solution. It is easier to access, available now in the form of NIT-CID, and it is already in 100% of the HD encoders in uplink trucks across North America. This alone with the current state of satellite transmission and the financial hardship it will have on the uplink industry leads me to ask for more time and discussion before forcing hard working, tax paying, small businesses to purchase equipment that isn't needed.

I want to thank you for taking time to review this information. I would welcome the opportunity to speak to you directly. If that is not an option an email response would be greatly appreciated. I can be reached at 612-308-9079 or I would happily reach out to you if you provide a contact number.

Regards,

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Check out our newly updated website at www.arcteksat.com